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09-AMCP-0188

JUL 31 2009

Ms. J. A. Hedges, Program Manager
Nuclear Waste Program
State of Washington
Department of Ecology
3100 Port of Benton
Richland, Washington 99354

Dear Ms. Hedges:

GROUNDWATER INDICATOR PARAMETER EXCEEDANCE AT 1324-N/NA
TREATMENT, STORAGE, AND/OR DISPOSAL (TSD) UNITS

This letter provides notice that indicator parameter results exceeded the critical mean comparison value for total organic carbon (TOC) at the 1324-N/NA TSD units, regulated under the Dangerous Waste Regulations at WAC 173-303-400, which references 40 CFR 265 subpart F. Well 199-N-165, a downgradient monitoring well, sampled in March 2009 yielded TOC results that averaged 1,003 micrograms per liter (ug/L), exceeding the critical mean value of 834 ug/L. The well was resampled in July 2009 and results of split samples from two laboratories averaged 885 ug/L and 911 ug/L, confirming the exceedance of the critical mean.

The following is required as a consequence of these results:

"...the owner or operator must provide written notice to the Regional Administrator within seven daysthat the facility may be affecting groundwater quality. [40 CFR 265.93(d)(1)]" (In this context, 'Regional Administrator' means State of Washington Department of Ecology).

"Within 15 days after the notification under paragraph (d)(1) of this section, the owner or operator must develop and submit to the Regional Administrator a specific plan... for a groundwater quality assessment program at the facility. [40 CFR 265.93(d)(2)]" (In this context, 'Regional Administrator' means State of Washington Department of Ecology). Note that although the U.S. Environmental Protection Agency has removed the requirement to submit the plan, the State of Washington Department of Ecology has retained the requirement through the Dangerous Waste Regulations.

The information in this letter is sufficient to fulfill both requirements above. The groundwater quality assessment consists of our determination that the 1324-N/NA TSD units are not a source of dangerous constituents contributing to the elevated TOC. The waste discharged to the 1324-N/NA TSD units contained sulfuric acid and sodium hydroxide and are designated "dangerous" because of the characteristic of corrosivity. No organic waste constituents were

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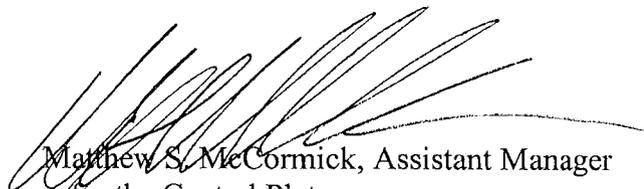
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disposed at these TSD units; therefore, elevated TOC cannot indicate dangerous constituents derived from these TSD units. The TSD units will remain in indicator-evaluation monitoring program as allowed under WAC 173-303-400 (and by reference to 40 CFR 265.93(d)(6)). In addition, the Fiscal Year 2008 critical mean value for this site was 1,787 ug/L as compared to the current critical mean value of 834 ug/L. The decrease in critical mean is primarily a result of reduced variability in analyses of samples from the upgradient well.

If you have any questions, please contact me, or your staff may contact Briant Charboneau, of my staff, on (509) 373-6137.

Sincerely,



Matthew S. McCormick, Assistant Manager
for the Central Plateau

AMCP:KMT

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